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April 27, 2017

Via ECF Only

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Thind v. Healthfirst, Inc. et al.*
1:14-cv-09539

Dear Judge Schofield:

This firm represents Kanwarpreet Thind and Facilitated Enrollers and, separately, Stevenson Marino LLP represents the Sales Managers or Collective A (collectively, the "Plaintiffs") in the above-referenced wage and hour matter. We write jointly on behalf of all Plaintiffs to request a brief one week enlargement of the parties' April 28, 2017 deadline to file a joint status letter, making the new deadline **May 5, 2017**. The requested enlargement of time will allow Plaintiffs to finalize the file transfer between outgoing and incoming counsel and additional time to address the items referenced in the Court's April 13, 2017 Order. *See* Dkt. No. 302.

As conflict issues were raised in connection with prior counsel for Plaintiffs' representation of all subclasses in this action, additional time is required to ensure that only materials that relate to the represented subclass is provided each incoming counsel. Moreover, identification of a replacement named Plaintiff for Collective A or B is further hindered by the afore-mentioned file transfer process.

This is the Plaintiffs' first application for an extension of the parties' deadline to file a joint status report. Defendants' counsel consents to this request. Your Honor's consideration in connection with this matter is greatly appreciated. Should the Court have questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Rebecca S. Predovan'.

Rebecca S. Predovan, Esq.

C: Counsel of Record (*via ECF*)